

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Criminal No. 04-10336-NMG
JULIO SANTIAGO et al.	)	
Defendants	)	

**GOVERNMENT'S RESPONSE TO THE MOTION OF DEFENDANT JOSE TORRADO (5  
TO MODIFY CONDITIONS OF RELEASE**

The United States Attorney, by and through the undersigned attorneys, now responds to the motion of Defendant Jose Torrado ("Torrado"), dated June 2, 2005, to modify the terms and condition of his release to eliminate the condition that he wear an electronic monitoring device.

Based upon the grounds for his motion and undersigned counsel's discussion with Pretrial Services ("PTS") Officer Christopher Wylie, Torrado's supervising PTS Officer, the government does not oppose the defendant's motion provided that the conditions of his release are also modified to require that Torrado report to PTS in person once a week and report to PTS by telephone once a week (in addition to the conditions previously imposed by the Court). PTS Officer Wylie agrees that such further modification of Torrado's conditions of release is appropriate.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

BY:

/s Denise Jefferson Casper  
DENISE JEFFERSON CASPER  
Assistant U.S. Attorney

Dated: June 15, 2005

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served upon Leno: Glaser, Esq., 25 Kingston Street, 6<sup>th</sup> Floor, Boston, MA 02111 a copy of the foregoing document by electronic filing and by depositing : the United States mail a copy of same in an envelope bearing sufficient postage for delivery.

This 15<sup>th</sup> day of June, 2005.

/s Denise Jefferson Casper  
DENISE JEFFERSON CASPER  
ASSISTANT UNITED STATES ATTORNEY